

UNITED STATES DISTRICT COURT
for the
Northern District of California

FILED

Jun 09 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

United States of America
v.

Joel Lamont DUNN,
Adrian WEBB

Case No. 3:23-mj-70840 MAG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2020 to October 2022 in the county of San Francisco in the
Northern District of California, the defendant(s) violated:

Code Section

21 U.S.C. § 846

Offense Description

Conspiracy to distribute controlled substance

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Lynn Reed.

☒ Continued on the attached sheet.

Approved as to form: /s/ Lina Peng
Assistant U.S. Attorney Lina Peng

/s/ Lynn Reed*Complainant's signature*Lynn Reed, FBI Special Agent*Printed name and title*

Sworn to before me by telephone.

Date: 06/09/2023

City and state: San Francisco, California


*Judge's signature*Hon. Sallie Kim, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT OF SPECIAL AGENT LYNN REED
IN SUPPORT OF CRIMINAL COMPLAINT**

I, Lynn Reed, Special Agent of the Federal Bureau of Investigations, being duly sworn, hereby state as follows:

INTRODUCTION AND PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint against and arrest warrant for Joel Lamont DUNN and Adrian WEBB for violations of Title 21, United States Code, § 846 (conspiracy to distribute a controlled substance, to wit, marijuana).

2. The facts set forth in this affidavit are based upon my personal investigation and from other investigators in this case. Because this affidavit is submitted for the limited purpose of establishing probable cause for the arrest of Joel Lamont DUNN and Adrian WEBB, I have not included each and every fact known to me about this case. In addition, where I recount what I learned from others and/or what I learned from reviewing documents, I am recounting such information in sum and substance and in relevant part only.

AGENT BACKGROUND

3. I have been employed as a Special Agent (“SA”) of the Federal Bureau of Investigation (“FBI”) since September 2019 and am currently assigned to the San Francisco Division. I have received training at the FBI Academy in Quantico, Virginia, including training on criminal procedure, search and seizure, violent crimes, and gang organizations. As part of my regular duties, I am assigned to a Violent Crimes/Major Offenders (“VCMO”) and Gang/Criminal Enterprise squad. My responsibilities include, among other things, conducting investigations into violations of federal criminal law. Prior to my employment as a FBI special agent, I worked as a local police officer, during which time I investigated robberies, assaults and frauds, among other crimes.

4. During my career I have participated in numerous types of investigations, to include narcotics, robbery, and possession of firearm and ammunition cases. The investigations involved reviewing police reports, reviewing body worn camera footage, collecting evidence,

conducting interviews, arresting suspects, working with local and state partners, and testifying in front of a Grand Jury. I have personally participated in the investigation discussed in this affidavit as a case agent and I am familiar with the facts and circumstances of the investigation.

5. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

APPLICABLE LAW

6. Section 841(a) of Title 21 of the U.S. Code makes it a crime for any person to knowingly or intentionally distribute or possess with intent to distribute a controlled substance.

7. Section 846 of Title 21 of the U.S. Code makes it a crime for any person to attempt or conspire to commit any crime defined under the subchapter.

STATEMENT OF PROBABLE CAUSE

8. Based on the facts set forth in this affidavit, there is probable cause to believe that DUNN, WEBB, and others known and unknown, employees of United Airlines, conspired to steal marijuana from checked baggage at San Francisco International Airport (SFO) and to further distribute that marijuana.

9. Law enforcement involved in this investigation have spoken with CS-1,¹ a source with knowledge of the conspiracy to steal marijuana by DUNN, WEBB, and others. These individuals are/were employed by United Airlines as ramp cargo agents. According to CS-1, beginning in approximately 2020, they were approached by DUNN to assist with stealing marijuana from checked baggage and was paid by DUNN in cash approximately \$2,000 each shift or more if large quantities were taken that day, up to approximately \$10,000 per week. The source would participate in helping steal marijuana approximately twice per week. The source

¹ I believe CS-1’s information to be reliable because of my training and experience, the corroborating information described in this affidavit, and other information I have learned in this investigation. In the initial interviews with law enforcement, CS-1 stated he had not been working the day DUNN and WEBB were robbed on June 8, 2021, when in fact he had been working.

identified that DUNN, WEBB, along with Individual-1 and others, were involved in the marijuana theft operation. The stolen marijuana would be transferred to black 15-20 gallon trash bags, including by WEBB, and then transferred to the conspiring employees' personal vehicles. Based on my training and experience, this quantity of marijuana is consistent with distribution to others and not personal use. CS-1 indicated that DUNN was the leader of the operation, and WEBB appeared to DUNN's right hand man and gave directions when DUNN was not around.

10. On or about June 8, 2021, DUNN and WEBB were robbed at gunpoint in the employee parking lot of SFO near their personal vehicles. DUNN and WEBB reported the robbery to law enforcement. Video surveillance footage, from shortly before the robbery, showed DUNN, WEBB and other employees move black trash bags out of the secure area airport, consistent with the marijuana theft scheme. Video surveillance shows WEBB carrying a black trash bag, walking through the parking garage, apparently heading towards his personal vehicle. DUNN and WEBB did not report to the police that any marijuana had been robbed from them.

11. On or about October 1, 2022, Individual-1 and Individual-2 exited the secure area of the airport with a cart carrying two large boxes, and a large black plastic bag on top of the boxes, and headed to the G-side of the International Garage. After being contacted by law enforcement, Individual-1 initially denied that the items were theirs and then later recanted. A subsequent search warrant revealed that the black trash bag and two boxes contained multiple vacuumed sealed bags, containing suspected marijuana, later confirmed by testing. Testing also showed that the gross weight of all the bags containing marijuana was approximately 14 kilograms or approximately 30 pounds. Based on my training and experience, this quantity of marijuana is consistent with distribution to others and not personal use. Prior to October 1, 2022, surveillance footage had captured Individual-1 and Individual-2, along with DUNN, WEBB, and others, on multiple occasions, taking bags containing unknown contents out of the secure area of the airport to personal vehicles.

CONCLUSION

12. Based on the facts set forth in this affidavit, beginning no later than 2020 and continuing until on or about October 1, 2022, in the Northern District of California, I believe there is probable cause to believe that DUNN, WEBB and others known and unknown conspired to distribute a controlled substance, specifically marijuana, in violation of Title 21, United States Code, § 846.

/s/ Lynn Reed

Lynn Reed
FBI Special Agent

Sworn to before me over the telephone and signed
by me pursuant to Fed.R.Crim.P 4.1 and 4(d) on
this 9 day of June 2023



HONORABLE SALLIE KIM
UNITED STATES MAGISTRATE JUDGE